

A717
Site: Herculaneum Road
ID # MD006 216323
Break: 2.0
Other: 12-19-02
km

THE
DOE RUN
COMPANY
SMELTING DIVISION

RECEIVED

DEC 24 2002

SUPERFUND DIVISION

Aaron W. Miller
Environmental Manager of Primary Smelting
amiller@doerun.com

December 19, 2002

Bruce Morrison
USEPA Region VII
901 North 5th
Kansas City, Kansas 66101

Re: Herculaneum Vehicle Wash Station

Dear Bruce:

I have received your letter of December 4, 2002, regarding the construction of the vehicle wash station at Herculaneum. As you know we have been conducting street sampling under the Transportation and Materials Handling Plan (TMHP) since June of 2002. During that time we have only had to wash vehicles a couple of times due to street conditions. We have not had a sample above 2 mg/ft² since October 1st.

During our early drafts of the TMHP Doe Run recognized the facts that 1) location of the automated vehicle wash was critical to its long-range performance and effectiveness, and 2) to complete construction construct a fully automated vehicle wash, including plumbing, electric, water drainage, collection and treatment would require considerable time. That is why we proposed interim cleaning procedures for sub-freezing conditions and set the completion date for the automated vehicle wash in 2003. When it became apparent that EPA would not approve the TMHP for Herculaneum unless Doe Run committed to construction of an automated vehicle wash in 2002, we agreed. Doe Run also requested additional time than EPA proposed. (EPA wanted November 1 completion date, Doe Run asked for December 1)

Subsequent to that agreement, Doe Run made a proposal for 3 alternate haul routes through Herculaneum. During the public input process it was determined that no change in haul route was appropriate until after the results of the voluntary purchase program was known. At such time MDNR and the City would designate a haul route.

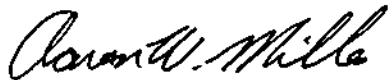
You recognized our dilemma associated with the siting of the vehicle wash prior to knowing where the haul route would be and told Doe Run that you didn't have any specific standards for the wash station as long as we had the ability to wash trucks. It could be temporary. We are very appreciative of this flexibility within the TMHP.



Therefore, we modified our plans and went with a temporary structure. That is what we have now. At the date of your letter we had sufficient structure in place to drive through, capture water and support a tarp or plastic sides and roof if washing in freezing weather was required (i.e. Tent). Furthermore, we are committed to washing vehicles if necessary, and to do whatever it takes to get it done.

Doe Run is working hard every day to comply with the Order and to making it right in Herculaneum. Should you have any questions please call.

Sincerely,

A handwritten signature in cursive script, appearing to read "Aaron W. Miller".

Aaron W. Miller
Environmental Manager of Primary Smelting
The Doe Run Company

Cc: Clif Gray, Doe Run
David Mosby, MDNR